Commonwealth of Kentucky
Division for Air Quality

PERMIT APPLICATION SUMMARY FORM

Completed by: Sajjad Quabili

GENERAL INFORMATION:

Name: The HON Company Owensboro Plant
Address: 931 Wing Avenue, Owensboro, Kentucky 42303
Date application received: June 25, 2008
SIC/Source description: 2521
Source ID: 21-059-00035
Source A.I. #: 964
Activity #: 20080004
Permit number: V-06-012 R2

APPLICATION TYPE/PERMIT ACTIVITY:

[ ] Initial issuance
[x] Permit modification
__Administrative
_x_Minor
__Significant
[ ] Permit renewal
[ ] General permit
[ ]Conditional major
[x] Title V
[x] Synthetic minor
[ ] Operating
[x] Construction/operating

COMPLIANCE SUMMARY:

[ ] Source is out of compliance
[ ] Compliance schedule included
[ ] Compliance certification signed

APPLICABLE REQUIREMENTS LIST:

[ ] NSR
[ ] PSD
[ ] Netted out of PSD/NSR
[ ] NSPS
[x] NESHAPS
[ ] Other
[ ] Not major modification per 401 KAR 51:001, 1(116)(b)
[ ] SIP

MISCELLANEOUS:

[ ] Acid rain source
[ ] Source subject to 112(r)
[x] Source applied for federally enforceable emissions cap
[ ] Source provided terms for alternative operating scenarios
[x] Source subject to a MACT standard
[ ] Source requested case-by-case 112(g) or (j) determination
[ ] Application proposes new control technology
[x] Certified by responsible official
[ ] Diagrams or drawings included
[ ] Confidential business information (CBI) submitted in application
[ ] Pollution Prevention Measures
[ ] Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual (tpy) 2007 Emission Inventory	Allowable (tpy)	Potential (tpy)
PM	2.471		68.35
SO_2	0.08		0.139
NOx	1.366		14.830
CO	2.276		38.164
VOC	103.534	<225	4446.8
HAPs			
Cumene (98-82-8)	0.544		4.49
Dibutylphthalate (84-74-2)	0.0		0.09
Xylene (1330-20-7)	18.163		436.99
Formaldehyde(50-00-0)	0.552		13.14
Toluene(108-88-3)	3.23		323.86
Methanol (67-56-1)	24.07		411.91
Ethyl benzene (100-41-4)	3.23		80.44

MINOR PERMIT REVISION: V-06-012 R2:

On June 25, 2008, The HON Company applied to the Division for a minor revision to their Title V air quality permit to add four paint spray booths (EP 10, EP 11, EP 12 and EP 13) at their Owensboro plant.

Comments:

EP 10, Paint spray booth: This emission point was decommissioned recently. The HON Company applied to the Division to reconstruct the paint booth. The paint booth consists of two applicators with a capacity of 10 gallons per hour each. The applicators will be utilized to spray sealer and top coat on the chair frames. Not more than one applicator at a time will be utilized to spray coatings in this paint booth.

EP 11, Paint spray booth: This paint booth consists of sixteen applicators with a capacity of 10 gallons per hour each. The applicators will be utilized to spray toner and stain on the wooden chair frame blanks. Not more than one applicator at a time will be utilized to spray coatings in this paint booth.

EP 12, Paint spray booth: This two paint booth consists of two applicators with a capacity of 10 gallons per hour each. The applicators will be utilized to spray sealer and top coat on the chair frames. Not more than one applicator at a time will be utilized to spray coatings in this paint booth.

EP 13, Paint spray booth: This paint booth consists of three applicators with a capacity of 10 gallons per hour each. The applicators will be utilized to spray sealer and top coat on the wooden chair frame.

Potential to emit:
The potential to emit (PTE) hazardous and non hazardous regulated air pollutants was recalculated. The PTE indicated increments of HAP, VOC and PM emissions for the source because of the addition of four emission points (EP 10, EP 11, EP 12 and EP 13). The synthetic minor limitation for VOC emissions will remain less than 225 tons per year. The actual VOC emission was 104 tons per year for the year 2007. The synthetic minor status for VOC emissions and title V status for both single HAP and combined HAPs will remain unchanged in the revised permit. The Division has determined that the revision to the permit is minor per 40 KAR 52:030, Section 14.

MINOR PERMIT REVISION: V-06-012 R1:

On March 28, 2008, The HON Company applied to the Division for a minor revision to their Title V air quality permit to modify the construction of an emission point (EP 09) and to rescind an emission point (EP 10) from the permit. The current permit (V-06-012), issued on November 29, 2006 approved the HON Company to construct and to operate the above mentioned emission points.

Comments:
EP 09, Paint spray booth: The current permit allowed the HON Company to construct this paint booth for spraying coatings. The paint booth consists of six applicators with a capacity of 10 gallons per hour each. The aggregate capacity of these applicators is 60 gallons per hour. The HON Company requested to the Division for a modification of the emission point to construct a paint spray booth consisting of sixteen applicators. The capacity of each applicator will be 10 gallons per hour. Not more than one applicator at a time will be will be utilized to spray coatings in this paint booth.

EP 10, Paint spray booth: The current permit allowed the source to construct a paint booth consisting of six applicators for spraying coatings. The capacity of the applicators together was 60 gallons per hour. The HON Company requested the Division to rescind the emission point from the permit.

Section 502(b)(10) changes:

In addition to above mentioned modifications, the Division has revised the permit to reflect the two recent Section 502(b)(10) changes pursuant to 401 KAR 52:020, Section 18 to the permit for a closure of an emission point (EP 06) and for changes of applying paints of two emission point (EP 04 and EP 05).

EP 06**:** The sealer spray booth (EP 06) will be removed from the revised permit to reflect the Section 502(b)(10) changes approved on February 20, 2008.

The following two emission points have been revised to reflect the Section 502(b)(10) changes approved on February 08, 2008:

EP 04: This spray booth will be utilized for spraying sealer material instead of spraying toner.

EP 05: This spray booth will be utilized to spray toner and stain instead of spraying of stain only.

Potential to emit:
The potential to emit (PTE) hazardous and non hazardous regulated air pollutants was recalculated. The PTE indicated a reduction of HAP, VOC and PM emissions for the source because of the removal of two emission points (EP 06 and EP 10) and due to reduction of the spraying capacity of EP 09. The HON Company is still a major source for VOC and HAP emissions. The synthetic minor status for VOC emissions and title V status for both single HAP and combined HAPs will remain unchanged. The Division has determined that the revision to the permit is minor per 40 KAR 52:030, Section 14.

SOURCE PROCESS DESCRIPTION: V-06-012

The HON Company operates a wood furniture manufacturing plant in Owensboro, Kentucky. The source applied to the Division to renew their Title V permit. Also, the source has requested an authorization to begin construction of two additional paint spray booths. Each spray booth will comprise of six applicators. The source is major for VOC and HAP emissions. VOC synthetic minor limit will remain unchanged to 225 tons per year in the renewed permit.

APPLICABLE REGULATIONS:

The HON Company is subject to the following regulations for their wood furniture manufacturing operations:

A. 40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, applicable to an affected facility that is engaged, either in part or in whole, in the manufacture of wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63.2. Emission points EP 04, EP 05, EP 06, EP 07 and EP 08 are classified as existing source. EP 09 and EP 10 are classified as new source.

B. 401 KAR 61:020, Existing process Operations, applicable to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulate, commenced before July 2, 1975.

C. 401KAR 50:012 Section 1(2) General Application of Administrative Regulations and Standards. In the absence of a standard specified in 401 KAR 50 to 65, administrative regulations, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical.

D. 401 KAR 59:010, New Process Operations, applicable to each affected facility or source, associated with process operation, which is not subject to another emission standard with respect to particulate, commenced on or after July 2, 1975.

E. Regulation 401 KAR 59:015, New indirect heat exchangers, applicable to an emission unit that has heat input capacity of more than one (1) million Btu/hr commenced on or after April 9, 1972.

F. 40 CFR 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters is applicable to waste wood fired boiler (EP 01). The compliance date for this Subpart is September 13, 2007.

G. 40 CFR 60 Subpart Dc, Standards of performance for small industrial-commercial-institutional steam generating units, applies to HON's waste wood fired industrial boiler commenced after June 9, 1989 that has a maximum design heat input capacity between 10 mmBtu/hr and 100 mmBtu/hr. No records or reports are required for a wood fired industrial boiler with an input capacity less than 30 mmBtu/hr.

PERIODIC MONITORING:

The Division is requiring The HON Company to keep daily records of usage of sealers, coatings, adhesives and thinners at each of the spraying booths and to summarize those records at the end of each month. The source shall also keep records of the monthly and twelve months rolling total for VOC and HAP emissions at the plant.